

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

BRIAN THOMPSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:22-cv-00060-NT
)	
JOHNSON CONTROLS, INC.,)	
)	
Defendant)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

The parties to the above-captioned case, by and through their undersigned counsel, hereby jointly move for a 30-day extension of the remaining scheduling order deadlines. Good cause exists to grant the relief requested herein pursuant to Fed. R. Civ. P. 6(b)(1)(A) for the following reasons:

1. Pursuant to ECF No. 19, and following a discovery conference, the Court extended discovery in the above-captioned case for 30 days, making the new discovery deadline May 2, 2023.
2. At the time of the discovery conference on March 31, 2023, key corporate representatives for Defendant were traveling internationally and unavailable.
3. During the March 31, 2023 conference, the Court ordered the parties to confer in good faith about the various disputes raised, especially given the discussion during the conference about the scope of Rule 26 applicable to the issues in this case.
4. The parties did as instructed and conferred about a narrowed set of interrogatories and document requests.

5. However, last week counsel for both Plaintiff and Defendant were each respectively out of the office due to unexpected and unrelated injuries.

6. Plaintiff's counsel suffered a corneal abrasion that required a full week's absence. Defense counsel also suffered an unexpected injury that required absence from work.

7. Defendant is working on a supplemental document production pursuant to the parties' attempt to reach agreement on the discovery issues discussed on March 31, 2023. Once Defendant produces those documents to Plaintiff, another discovery conference may be necessary.

8. Additionally, Plaintiff will need time to review the supplemental document production before the remaining depositions in this case can be conducted.

9. For all of the foregoing reasons, good cause exists to grant a 30-day extension in the discovery deadline.

WHEREFORE, the parties jointly request that the Court grant their motion to amend the scheduling order as set forth herein, with the remaining deadlines extended as follows:

Discovery deadline: June 1, 2023

Deadline re: notice/summary judgment: June 8, 2023.

Motion deadline: June 22, 2023.

Trial ready: July 2023.

Respectfully submitted,

Dated: April 25, 2023

/s/ *Laura H. White*

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Dated: April 25, 2023

/s/ *Aimee B. Parsons*

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CERTIFICATE OF SERVICE

I, Laura H. White, hereby certify that on this 25th day of April, 2023, I filed the foregoing Joint Motion to Amend Scheduling Order with the Court's CM/ECF system, which automatically sends notification to all counsel of record.

Dated: April 25, 2023

/s/ Laura H. White

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